

**IN THE UNITED STATES BANKRUPTCY COURT  
IN THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE:**

**BANKRUPTCY NO: 22-00539-JAW**

**FREDDIE MONCRIEF  
116 KILDARE COURT  
JACKSON, MS 39209**

**NOTICE AND MOTION TO DISMISS**

**COMES NOW**, Harold J Barkley Jr., the duly appointed and qualified Standing **TRUSTEE** in the above cause and moves to dismiss the above proceeding for the reason that the **DEBTOR** has failed to make payments into the plan as required by Chapter 13 of the Bankruptcy Code.

**NOTICE IS HEREBY GIVEN**, to the **DEBTOR** herein, that unless the below required sum is received by the **TRUSTEE**, or a written responsive pleading is filed with the Clerk of the Court with a copy to the **TRUSTEE** prior to the below depicted due date, the Chapter 13 proceeding of the above **DEBTORS** will be dismissed.

**NOTICE IS FURTHER GIVEN** that, in the event a written responsive pleading is filed, a hearing on the matter will be held in the Bankruptcy Courtroom 4C, 501 E. Court St., Jackson, MS on **AUGUST 18, 2025 @ 10:00 am**.

**WHEREFORE**, **TRUSTEE** moves this Court to enter its Order of Dismissal unless said sum is received as set out herein or said responsive pleading is properly filed.

MAIL PAYMENTS TO:

Harold J. Barkley, Jr.

Chapter 13 Trustee

P.O. Box 321454

Flowood, MS 39232

**AMOUNT DUE BY 08/06/2025: \$3,168.00**

(As of 07/15/2025 thru end of month)

DATED: 7/16/2025

/s/ Harold J. Barkley, Jr. -

Harold J. Barkley, Jr. - MSB#2008

Chapter 13 Trustee

P O Box 4476

Jackson, MS 39296-4476

Phone: 601-362-6161

Fax: 601-362-8826

Email: hjb@hbarkley13.com

**CERTIFICATE OF SERVICE**

I, Harold J. Barkley, Jr., Standing Trustee, do hereby certify that on the above date of the Notice and Motion to Dismiss, I mailed, postage prepaid, a true and correct copy of the foregoing pleading to the **DEBTOR**, and by ECF Filing Notification to the Attorney for the **DEBTOR** herein and to the Office of the U.S. Trustee.

THOMAS C. ROLLINS, JR  
[trollins@therollinsfirm.com](mailto:trollins@therollinsfirm.com)

Office of the U S Trustee  
[ustpreion05.ja.ecf@usdoj.gov](mailto:ustpreion05.ja.ecf@usdoj.gov)

**FREDDIE MONCRIEF**  
**116 KILDARE COURT**  
**JACKSON, MS 39209**

**DATED: 7/16/2025**

/s/ Harold J. Barkley, Jr.  
Harold J. Barkley, Jr. - MSB#2008